

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,)
) CASE NO. 3:24-cr-00064
v.)
)
CAMILO CAMPOS-HURTADO)
a/k/a “Camilo Campos”)
a/k/a “Arturo Lopez”)
a/k/a “Hurtado Camilo Campos”)

MOTION FOR A DETENTION HEARING AND DETENTION

The United States of America, by and through Henry C. Leventis, United States Attorney for the Middle District of Tennessee, and Monica R. Morrison and Kathryn Risinger, Assistant United States Attorneys, respectfully files this Motion for a Detention Hearing and Detention pursuant to 18 U.S.C. § 3142(f)(1)(A), which mandates a hearing upon motion of the United States in a case that involves a crime of violence, because the defendant constitutes a danger to the community and a flight risk.

A. Legal Basis for Detention:

Pursuant to Title 18, United States Code, Section 3142(f)(1)(A), the Court shall hold a hearing to determine whether any condition or combination of conditions will reasonably assure the appearance of the defendant or the safety of the community upon a motion by the Government in a case that involves “a crime of violence.” In this case, the defendant was charged on March 20, 2024, with four counts of Sexual Exploitation of a Minor, under chapter 110, in violation of 18 U.S.C. § 2251(a); one count of Receipt of Visual Depictions of Minors Engaged in Sexually Explicit Conduct, under Chapter 110, in violation of 18 U.S.C. § 2252(a)(2) and (b). Pursuant to 18 U.S.C. § 3156(a)(4)(C), the term “crime of violence,” as used in 18 U.S.C. § 3142(f)(1)(A), includes any felony under chapter 109A, 110, or 117. Therefore, the United States is entitled to a

detention hearing in this case. The United States further moves for a continuance of three days in order to prepare for the detention hearing.

The United States further moves that the Court detain the defendant because, pursuant to 18 U.S.C. § 3142(e)(3)(E), he is unable to overcome the rebuttable presumption that no conditions, or combination of conditions, will reasonably assure his presence in court or the safety of the community.

B. Factual Basis for Detention:

1. Facts Underlying Charges:

i. Risk of Danger to the Community:

The defendant poses a clear risk of danger to the community if released. Between June 22, 2023, and June 23, 2023, the defendant was found to be in possession of a cellular telephone and multiple other electronic devices that contained images of child sexual abuse material (“CSAM”) that he produced between January 2017 and January 2021 when he raped numerous minor males, most of whom were unconscious.

For example, the defendant recorded a video of Minor Victim 1 during which the defendant pulled down Minor Victim 1’s shorts, rubbed his buttocks, and raped him—all while Minor Victim 1 appeared to be unconscious. Minor Victim 1 was 14 years old at the time this video was produced.

The defendant also recorded videos of Minor Victim 2 when Minor Victim 2 was approximately nine and ten years old. In the first video, Minor Victim 2 was conscious when the defendant pulled down the victim’s underwear and started raping him. During this video, Minor Victim 2 attempted to roll over onto his back and asked the defendant to stop. In a second video involving Minor Victim 2, the defendant, who was naked, stood behind Minor Victim 2, who was

conscious and on his hands and knees, and raped him. After the defendant finished raping Minor Victim 2, the defendant retrieved a towel and wiped Minor Victim 2's buttocks.

The defendant also recorded multiple videos of Minor Victim 3 who was 16 years old at the time. During these videos, the defendant is seen raping Minor Victim 3 multiple times, while he was unconscious. In one video, Minor Victim 3 started to regain consciousness, so the defendant sat him up, forced him to drink something, pulled down the victim's underwear and raped him.

The defendant also photographed Minor Victim 4 in a state of undress when he was 17 years old and unconscious.

Additionally, the defendant's devices contained numerous photos of unconscious adult males with their pants pulled down and buttocks exposed; similar photos of unconscious males of questionable age; and countless images of CSAM that the defendant had received and/or downloaded between March 20, 2019, and June 23, 2023.

ii. Flight Risk:

In addition to posing a serious risk of danger to the community, the defendant poses a flight risk if released from custody because the defendant is illegally present in the United States and was found to be in possession of numerous counterfeit identification cards. He is an undocumented alien from Mexico who, on June 23, 2023, was in possession of three counterfeit social security cards in the names of Arturo Lopez, Camilo Campos, and Camilo Campos Hurtado; two counterfeit legal permanent resident cards in the names of Arturo Lopez and Hurtado Camilo Campos; and a counterfeit resident alien card in the name of Camilo Campos.¹

¹ The defendant was also in possession of a Mexican Consular identification card in the name of Camilo Campos-Hurtado, which HSI determined to be genuine.

CONCLUSION

WHEREFORE, PREMISES CONSIDERED, the Government respectfully requests that the Court hold a detention hearing in the above-referenced case, and following any such hearing, the Court detain the defendant pending trial.

Respectfully submitted,

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Middle District of Tennessee

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CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2024, I electronically filed one copy of the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a Notice of Electronic Filing to counsel for defendant in this case.

/s/ Kathryn Risinger
KATHRYN RISINGER
Assistant United States Attorney